Vitamins'

Herbs



Food

Cosmetics

CTS 9

March 15, 2005

We Make Quality Affordable -7 P2:27

Food and Drug Administration
Center for Food Safety and Applied Nutrition
Office of Nutritional Products, Labeling, and Dietary Supplements
Division of Nutritional Programs and Labeling
200 C Street SW
Washington, DC 20204

MAR 2 4 2005

Re:

21 U.S.C. Section 343(r)(6), Notification of Statements on Dietary Supplements

## Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of Immune Renew<sup>TM</sup> VCaps, a dietary supplement.

## Statements being made in the labeling of Immune Renew<sup>TM</sup> V Caps:

NOW<sup>®</sup> Immune Renew<sup>TM</sup> is a potent immune system supporting formulation containing standardized Astragalus Extract and a High Beta-Glucans Proprietary Mushroom Blend. Astragalus has been shown in non-clinical studies to support a number of aspects of healthy immune function, including the enhancement of T-Cell and Natural Killer Cell activity. Natural killer cells are so named because they destroy unhealthy cells in the body virtually on contact. NOW's Proprietary Blend of eight organic mushrooms provides additional immune support due to its high 1,3 Beta Glucan content. 1-3 beta glucans are especially valuable to immune system response, though they're increasingly lacking in today's typical diet. Scientific studies have demonstrated that the 1,3 form of Beta Glucans found in mushrooms possesses remarkable abilities to support both innate and adaptive immunity. A strong, responsive immune system is the foundation of good health. Use NOW<sup>®</sup> Immune Renew<sup>TM</sup> to help support healthy immune function seasonally and throughout the year.

To the best of my knowledge, and based upon information and belief present at the time of the executing of this notice, I certify that the above information is accurate and complete. NOW Foods possesses substantiation that the statements are truthful and not misleading.

Michael Lelah, Ph.D. Technical Director NOW Foods 395 S. Glen Ellyn Rd. Bloomingdale, IL 60108

Meihaulelah

975 0162

100-

15887

LET